

EXHIBIT D

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, ss.

SUPERIOR COURT
DOCKET #071882

COMMONWEALTH

v.

SHAWN DRUMGOLD

AFFIDAVIT OF LOLA ALEXANDER IN SUPPORT OF DEFENDANTS MOTION
FOR A NEW TRIAL

I, Lola Alexander, hereby depose and state:

1. On the night of August 19, 1988, I was living at 72 Homestead Street in Roxbury, Massachusetts, with my daughter and grandson.
2. I heard gunshots that evening from my bedroom. I went to the window and saw my daughter Mary Alexander on the porch with her baby son. I went to the door and told her to get inside with the baby right away.
3. Once inside Mary told me that she thought that someone got shot near the mailboxes.
4. Neither Mary nor I knew Shawn Drumgold.
5. Police detectives came to Mary and me and kept questioning us about the murder.
6. I continually told them that I did not see anything and they did not want to hear that. They kept telling me that I had to have seen who did the shooting.
7. I believe Detective Walsh was the one who told that I must have seen Shawn Drumgold out there on the night of the shooting. I told him that I do not know Shawn Drumgold from Adam House.
8. Both detectives were after Mary to identify the Shawn Drumgold as the shooter. After viewing photograph's on a number of occasions, Mary told them that she could not identify anyone.
9. I told the detectives that Mary was very sick and was having severe headaches. I told them I had to hold Mary's head in my lap every single night and stroke her head to try and ease the pain for her. Yet they continued to harass Mary and me by continually coming by the house or calling on the telephone. They came by the house at the minimum of 1-2 times per week right up until trial.
10. One time I told Detective Walsh to stop coming by my house to question me. He did stop coming but then two detectives from Brookline came by my work and tried to question me about the murder. I was upset about them coming to my work and continuing to try and question me after I made it clear that I knew nothing.
11. As time got closer to the trial of Shawn Drumgold, Mary told me that the detectives were by again and asked her to identify one of the boys fleeing the

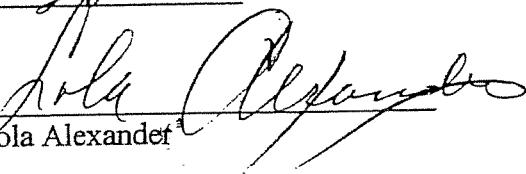
scene. Mary said that some police officer pointed to one picture and asked "Is that him?" Mary said she was tired of them harassing her and they were going to make her testify anyway, so she said, "Yes that's him."

12. As the trial neared, Mary's pain got worse and worse. The detectives kept pressuring her right up to the time of trial. Mary was very frightened.

13. Mary had asked the detectives to make sure her face was not shown in the press. They promised her that she would not be shown. They also promised her that they would protect her by moving her outside the city after she testified. Neither came true and Mary never heard from the detectives after she testified.

SIGENED UNDER THE PAINS AND PENALTIES OF PERJURY THIS
28 DAY OF MAY, 2003.

Lola Alexander

A handwritten signature in black ink, appearing to read "Lola Alexander". The signature is fluid and cursive, with "Lola" on top and "Alexander" below it.